

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

RELATED COMPANIES LLP et al.

Defendants.

Case No. 22-cv-01738

**NOTICE OF MOTION TO DISMISS  
COMPLAINT PURSUANT TO FED. R.  
CIV. P. §§ 12(b)(5), (6)**

**PLEASE TAKE NOTICE** that, upon the Memorandum of Law in Support of their Motion to Dismiss the Complaint, dated April 21, 2022, and all prior pleadings and proceedings in this matter, Defendants The Related Companies, L.P., Bridge Land West LLC, Stephen M. Ross, Bruce Beal, Jr., Jeff T. Blau, Kenneth Wong, Michael Herrington, Bonita Chung, Michael Hillier, Ivan Marchuk, Alexi Polanco, and Angel Cortes (collectively, the “Defendants”) will move this Court, before the Honorable Vernon S. Broderick, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, on a date and time to be designated by the Court, for an Order (1) pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing the action as against all Defendants based upon failure to state a claim upon which relief can be granted; (2) pursuant to Rule 12(b)(5), dismissing the action as against Individual Defendants Beal, Blau, Wang, Herrington, Chung, Hillier, Marchuk, Polanco, and Cortes based upon insufficiency of process; and (3) denying Plaintiff permission to proceed anonymously, and directing the Clerk of the Court to amend the caption to reflect Plaintiff’s identity.

**PLEASE TAKE FURTHER NOTICE** that, Pursuant to Local Civil Rule 6.1(b), Plaintiff's Opposition papers must be filed by May 5, 2022, and Defendants' Reply papers must be filed by May 12, 2022.

Dated: New York, New York  
April 21, 2022

Respectfully submitted,

**WALDEN MACKT & HARAN LLP**

By: /s/ Georgia K. Winston

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